REMARKS/ARGUMENTS

Claims 1-53 remain in this application.

A. Rejections under 35 U.S.C. 102

Claims 1-53 were rejected under 35 U.S.C. 102 as anticipated by Thomas. This rejection is respectfully traversed.

Claims 1, 18, 41 and 42 call for, among other things, an act of or means for associating a meta-data attribute with a stored true-data attribute. Claim 42 as originally filed calls for a profile object that includes both a true-data attribute and a meta-data attribute describing the true-data attribute. At least these features of Applicant's independent claims are not shown or suggested in the Thomas reference.

The Office Action asserts that Table 4 of the Thomas reference shows a true-date attribute including a true data key ("Object Type"), a true data value ("#1") and a metadata attribute (e.g., "Search Parameters" and "Executable Information"). Prior responses have challenged whether Table 4 in fact shows anything that would fit into the claim terms as those terms are used in the specification. Nevertheless, for purposes of this response, the premises asserted in the Office Action will be accepted.

Significantly, if "Object Type" = "#1" is taken as the true data, then the limitations of applicant's claims are not met. Claim 1, for example, calls for "managing said true-data attribute according to said associated meta-data attribute". Thomas uses the "Search Parameters" and "Executable Information" to guide the instantiation of a particular object, but these values have absolutely no stated effect on accessing or managing access to the "Object Type" and "#1" data. Thomas teaches that accessing the Implementation Repository results in a return of data "required to access the code to be executed and the libraries to be used in activating the object implementation". The data returned does not include any information about the literal values of "Object Type" or "#1".

This is not just a semantic argument. To the extent the data held in the "Search Parameters" and "Executable Information" attributes is metadata, it is metadata that describes a particular object instance, not metadata that describes the

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"Object Type" key or the "#1" value. Thomas does not even consider an application in which the "Object Type" or "#1" information is returned from the Information Repository.

However, a more significant issue lies in the fact that the data structure shown in Fig. 4 does not illustrate an object containing true-data <u>and</u> meta-data. Thomas shows a structure that arguably contains true-data that is used to instantiate an object, or which may be described as meta-data that describes an object instance. However, the object instance is not contained in the profile itself—the object instance exists entirely and literally outside of the data structure shown in Thomas' Table 4.

Claim 1 calls for the true-data attribute to be managed. Claim 18 calls for methods to access user data according to a meta-data attribute. Claim 41 calls for means for managing the true data attribute. In Thomas, the <u>literal values</u> "object type" and "#1" data are never managed nor is their access controlled. While the objects that belong to "object type #1" may use the data from the attributes, this is very different from the claimed method and structures.

Claim 42 calls for a profile object containing both true data and meta-data describing the true data. As set out above, Thomas shows, at best, an object containing metadata that describes something that exists entirely outside of the data structure itself. Hence, these limitations of claim 42 are not satisfied by Thomas.

Claims 2-17, 19-40, and 43-53 that depend from claims 1, 18 and 42, respectively, are believed to be allowable for at least the reasons set out above. Moreover, each of the dependent claims is believed to be independently allowable because they call for specific meta-data values that are not shown or suggested in the relied on reference.
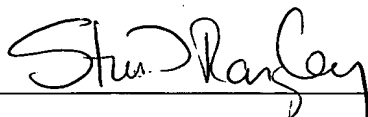
B. <u>Conclusion</u>

In view of all of the above claims 1-53 are believed to be allowable and the case in condition for allowance which action is respectfully requested.

No fee is believed to be required by this response as determined on the accompanying transmittal letter. Should any other fee be required, please charge Deposit 50-1123. Should any extension of time be required please consider this a petition therefore and charge the required fee to Deposit Account 50-1123.

Respectfully submitted,

Date: <u>June 27, 2002</u>   BY:_____

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